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Our File No. 10-06-6997-NV

ECF FILED ON:
FEB 22 2011

Attorney for Creditor
U.S. Bank National Association as Trustee for JP ALT 2006-S1

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

In re:
ROGER PIERRE BAYLOCQ

Debtor(s)

CHAPTER 11
BANKRUPTCY NO.: 10-51372-GWZ
DATE: March 29, 2011
TIME: 10:00 AM

RE: 2370 Del Monte Lane, Reno, NV 89511

**NOTICE OF MOTION FOR RELIEF FROM STAY FOR THE PURPOSE OF EVICTION
WITH CERTIFICATE OF SERVICE**

TO: Roger Pierre Baylocq	DEBTORS
TO: JOHN WHITE, ESQ.	ATTORNEY FOR THE DEBTOR(S)
TO: U.S. TRUSTEE-LV-11	CHAPTER 11 TRUSTEE
TO: ALL INTERESTED PARTIES	
TO: THE CLERK OF THE ABOVE ENTITLED COURT	

NOTICE IS HEREBY GIVEN that a MOTION FOR RELIEF FROM THE AUTOMATIC STAY FOR THE PURPOSE OF EVICTION was filed herein on February 22, 2011, by Michael W. Chen, Esquire, attorney of record for the Creditor, U.S. Bank National Association as Trustee for JP ALT 2006-S1. The motion seeks to lift the stay to pursue any and all necessary steps to obtain full right, possession and interest in the subject property located at 2370 Del Monte Lane, Reno, NV 89511, including, but not limited to, eviction and sale.

"Except for motions made pursuant to Fed.R.Bank.P. 7056 (c) and, an opposition to a motion must be filed and service completed upon the movant not later than fourteen (14) days before the hearing date or within the time otherwise fixed by the court. The opposition must set forth all relevant facts and must contain a legal memorandum. An opposition may

1 be supported by affidavits or declarations that conform to the provisions of subsection (c) of
2 this rule.”.”

3
4 If you object to the relief requested, you *must* file a WRITTEN response to this
5 pleading with the court. You *must* also serve your written response on the person
6 who sent you this notice.

7 If you do not file a written response with the court, or if you do not serve your written
8 response on the person who sent you this notice, then:

- 9 • The court may *refuse to allow you to speak* at the scheduled hearing; and
- 10 • The court may *rule against you* without formally calling the matter at the
11 hearing

12 (i) Individuals representing themselves are not exempt from this rule.

13 (ii) To ensure compliance with this rule, the court may deny any motion or request for an
14 order that does not contain the above notice.

15
16 **NOTICE IS FURTHER GIVEN** that the hearing on the said motion will be held before
17 a United States Bankruptcy Court Judge at the 300 Booth Street, Reno, NV 89509
18 Courtroom # 1, 5th Floor, on March 29, 2011 at 10:00 AM.

19
20 **THE COOPER CASTLE LAW FIRM**
21 A Multi-Jurisdictional Law Firm

22 /s/ Michael W. Chen

23 Michael W. Chen, Esquire

24 Nevada Bar No. 7307

25 820 South Valley View Blvd.

Las Vegas, NV 89107

Attorneys for Creditor

U.S. Bank National Association as Trustee for JP ALT 2006-S1

CERTIFICATE OF SERVICE

The undersigned hereby declares and certifies that on February 22, 2011, a copy of the Creditors MOTION FOR RELIEF FROM STAY FOR THE PURPOSE OF EVICTION and NOTICE OF MOTION was served on the parties through the following means:

Depositing a copy in the United States Mail, postage prepaid and addressed to:

Roger Pierre Baylocq
1275 Stardust Street
Reno, NV 89503

Roger Pierre Baylocq
2370 Del Monte Lane
Reno, NV 89511

TRUSTEE
U.S. TRUSTEE-RN-11
300 Booth Street
Suite 2129
Reno, NV 89509

JOHN WHITE
335 W FIRST ST
RENO, NV 89503

Maupin, Cox & LeGoy
Attn: Christopher D. Jaime, ESQ.
Attorney for Bert & Emma Van
Komen
4785 Caughlin Parkway
P.O. Box 30000
Reno, NV 89520

Prober & Raphael, a Law Corporation
Attn: Dean R. Prober, ESQ.
20750 Ventura Boulevard, Suite 100
Woodland Hills, California 91364

Law Office of Richard G. Hill
Attn: Casey D. Baker, ESQ.
Post Office Box 2551
Reno, Nevada 89505

Certified Mail:

GE Money Bank
Attn: Ramesh Singh
c/o Recovery Management Systems
Corp. 25 SE 2nd Avenue, Suite 1120
Miami, FL 33131-1605

Leo P. Bergin
McDonald Carano Wilson LLP
100 West Liberty St., 10th Floor
Reno, NV 89501

Nhu Q. Nguyen, Sr. Deputy Attorney General
Office of the Nevada Attorneys General
100 North Carson Street
Carson City, Nevada 89701

I declare under penalty of perjury that the foregoing is true and correct.

/s/ Tyler Sharpe

An employee of THE COOPER CASTLE LAW FIRM